

AO 91 (Rev. 11/11) Criminal Complaint

FELONY**UNITED STATES DISTRICT COURT**for the
Southern District of TexasUnited States District Court
Southern District of Texas**FILED**

JUL 10 2020

United States of America)

V.)

Marcos Daniel GOMEZ)

Defendant(s))

Case No.

1:20-MJ-472

David J. Bradley, Clerk of Court

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.
On or about the date(s) of July 9, 2020 in the county of Cameron in the Southern District of Texas, the defendant(s) violated:

Code Section

18 USC 2251 (a) and (e) and 18 USC 2252A(a)(5)(B)

*Offense Description*Production of Child Pornography and Possession of and Access with
Intent to View Child Pornography

This criminal complaint is based on these facts:

On July 9, 2020, members of the Homeland Security Investigations (HSI) led Rio Grande Valley Child Exploitation
Investigations Task Force (RGV CEITF) executed a search warrant at [REDACTED], Brownsville, Texas.

Post-Miranda, special agents conducted an interview of Marcos GOMEZ, who admitted to being in possession of hundreds of
images of child pornography. GOMEZ voluntarily showed the agents the images of child pornography that he stored on a
cellular phone that he stated he had sole access to.

In conducting the investigation, agents observed additional images of child pornography that were contained in the camera roll of
GOMEZ's cellular phone, manufactured in China. GOMEZ admitted he coerced a prepubescent minor for the purpose of
producing a visual depiction of sexually explicit conduct, that included the minor conducting a sexual act on GOMEZ.



Continued on the attached sheet.

Submitted by reliable electronic means, sworn to
and signature attested as per Fed Rules Cr. Proc. 4.1.

July 10, 2020

Date

Brownsville, Texas

City and State

Stephen J. Reuther
Complainant's Signature

Stephen Reuther Special Agent

Printed name and title

[Signature]
Judge's Signature

Ignacio Tortey III U.S. Magistrate Judge

Printed name and title